IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

AMAZON.COM, INC. and AMAZON DATA SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR COMMERCIAL PARTNERS; BRIAN WATSON; STERLING NCP FF, LLC; MANASSAS NCP FF, LLC; NSIPI ADMINISTRATIVE MANAGER; NOVA WPC LLC; WHITE PEAKS CAPITAL LLC; VILLANOVA TRUST; CASEY KIRSCHNER; ALLCORE DEVELOPMENT LLC; FINBRIT HOLDINGS LLC; CHESHIRE VENTURES LLC; CARLETON NELSON; JOHN DOES 1-20,

Defendants.

800 HOYT LLC,

Intervening Interpleader Plaintiff,

v.

BRIAN WATSON, WDC HOLDINGS, LLC, PLW CAPITAL I, LLC, BW HOLDINGS, LLC, AMAZON.COM, INC., and AMAZON DATA SERVICES, INC.

Interpleader Defendants.

CASE NO. 1:20-CV-484-LO-TCB

PLAINTIFFS' NOTICE OF FILING PURSUANT TO OCTOBER 27, 2021 ORDER

Plaintiffs Amazon.com, Inc. and Amazon Data Services, Inc. hereby respectfully notify the Court that they have filed "a proposed order appointing a receiver for this Court's review and

approval" and the "qualifications of a proposed receiver," in accordance with the Court's October 27, 2021 Order granting Plaintiffs' Motion To Hold Defendants Brian Watson & WDC Holdings LLC In Civil Contempt. Dkt. 413 at 2.

Attached hereto as **Exhibit 1** is the proposed order appointing a receiver for this Court's review and approval.

Attached hereto as **Exhibit 2** are the qualifications of the proposed receiver, Mark A. Roberts, CPA, of Alvarez & Marsal, located at 1001 G Street NW, Suite 1100 West, Washington, D.C. 20001.

Dated: November 3, 2021 Respectfully submitted,

s/ Michael R. Dziuban

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Counsel for Plaintiffs Amazon.com, Inc. and Amazon Data Services, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on November 3, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system. I will then send the document and a notification of such filing (NEF) to the following parties via U.S. mail to their last-known address and by email, where noted:

Jamie Hubbard Stimson Stancil LaBranche Hubbard 1652 Downing Street Denver, CO 80218 Counsel for Defendants White Peaks Capital LLC and NOVA WPC LLC

Villanova Trust c/o Christian Kirschner, Trustee 3924 Wallace Lane Nashville, TN 37215 Casey Kirschner 635 N. Alvarado Lane Plymouth, MN 55447 By email: casey.kirschner@gmail.com

<u>s/ Michael R. Dziuban</u>

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